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Via ECF

The Honorable Dennis Montali, U.S.B.J.
United States Bankruptcy Court
for the Northern District of California
450 Golden Gate Avenue, 16th Floor
San Francisco, CA 94102

Re: In re PG&E Corporation, Case No. 19-30088-DM

Dear Judge Montali:

This office represents certain securities claimants (the “RKS Claimants”) in the above matter. Pursuant to the Court’s September 18, 2024 Memorandum Decision on Thirty-Third and Thirty-Fourth Securities Omnibus Claims Objections (the “Memorandum Decision”), we are concurrently filing herewith a Second Amended Statement of Claim on Behalf of the RKS Claimants (the “Second RKS Amendment”). To facilitate any review of the Second RKS Amendment, the RKS Claimants submit with this letter a redline of the Second RKS Amendment to the original Amended Statement of Claim, showing insertions and deletions of allegations.

In particular, the Second RKS Amendment conforms with the Memorandum Decision by removing the July 16, 2018 alleged misstatement by Nickolas Stavropoulos, which the Court found not to be actionable.

In addition, and in accordance with the Memorandum Decision’s invitation to amend, the Second RKS Amendment makes further limited amendments to certain allegations relating to corrective events where the Court sustained Reorganized Debtors’ objection. Specifically, the Second RKS Amendment amends the factual basis for the October 12, 2017 corrective event, the factual and legal bases for the December 20, 2017 corrective disclosure event, and clarifies that information entering the market from November 9-12, 2018 had continuing effects on the prices of PG&E securities through November 14, 2018. Per the Memorandum Decision (at 3), and because the Court will act as the factfinder in this matter, the RKS Claimants respectfully submit that the Court will determine the legal and factual sufficiency of these limited amendments on a full record following an evidentiary hearing alongside all other issues.

Very truly yours,

Richard A. Bodnar